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ATTORNEYS FOR  
SCOTT M. SEIDEL, TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	Chapter 7
GOODMAN NETWORKS, INC.,	§	
	§	Case No. 22-31641-mvl-7
Debtor.	§	

**TRUSTEE’S MOTION FOR EMERGENCY HEARING ON TRUSTEE’S MOTION  
TO SELL ESTATE PROPERTY VIA PRIVATE SALE FREE AND CLEAR OF LIENS,  
CLAIMS AND ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363(f)**

TO THE HONORABLE MICHELLE V. LARSON, U.S. BANKRUPTCY JUDGE:

COMES NOW Scott M. Seidel (the “Trustee”), the duly appointed trustee for the estate (the “Estate”) of Goodman Networks, Inc. (the “Debtor”) in the above-styled bankruptcy case (the “Bankruptcy Case”) and files this *Motion for Emergency Hearing on Trustee’s Motion to Sell Estate Property via Private Sale Free and Clear of Liens, Claims and Encumbrances Pursuant to 11 U.S.C. § 363* (the “Motion”), respectfully stating as follows:

1. Concurrently herewith, the Trustee has filed his *Trustee’s Emergency Motion to Sell Estate Property via Private Sale Free and Clear of Liens, Claims and Encumbrances Pursuant to 11 U.S.C. § 363(f)* (the “Underlying Motion”). As explained therein, the Trustee and the Tiger Athletic Foundation (“TAF”) have agreed to a sale of certain equipment, the distributed antenna system (“DAS”), owned by the Debtor and installed at Louisiana State University’s Tiger Stadium.

2. By this Motion, the Trustee requests an emergency hearing on the Underlying Motion on or before March 4, 2024.

3. Grounds to hear the Underlying Motion on an emergency basis exist. Because the DAS is a critical part of LSU's safety and infrastructure at Tiger Stadium—allowing LSU to amplify cell signals, send emergency messages, and provide for patrons' ability to send communications while in the stadium—TAF has an urgent need to either restore or remove and replace the DAS immediately to ensure functionality before the beginning of the 2024-2025 LSU football season. The limited value of the DAS was estimated by the Debtor as recently as 2021, and such value at the time was approximately \$32,000. Since 2021, the value of the DAS has only depreciated. TAF, on the other hand, has offered to purchase the DAS from the Debtor for a price of \$50,000 subject to this Court's approval of the sale on an expedited basis.

4. The DAS is subject to a first-priority, perfected security interest held by U.S. Bank, National Association (the "Collateral Agent") pursuant to secured notes, as defined in the Underlying Motion, issued by the Debtor and held by UMB Bank, National Association (the "Indenture Trustee").

5. Both the Collateral Agent and the Indenture Trustee have agreed to the Trustee's sale of the DAS to TAF pursuant to the terms identified in the Underlying Motion.

6. The Trustee further submits that an emergency hearing will not prejudice any party. The party with the security interest in the DAS approves of the proposed sale. As further explained in the Underlying Motion, approval of the sale on the proposed terms captures greater value for the Estate than would be otherwise available. TAF's proposed purchase price very likely exceeds what the DAS would fetch pursuant to another sale, following an expensive process to remove the

DAS from Tiger Stadium's facilities. These terms are contingent upon this Court's approval as expeditiously as possible.

7. The Trustee estimates that a hearing on the Underlying Motion will take thirty (30) minutes.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully requests that the Court set the Underlying Motion for an expedited hearing on or before March 4, 2024.

RESPECTFULLY SUBMITTED this 27th day of February, 2024.

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ Thomas Berghman  
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**ATTORNEYS FOR SCOTT M. SEIDEL,  
TRUSTEE**

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that she conferred with counsel for the Collateral Agent, the Indenture Trustee, and TAF, and all parties consent to the relief requested herein.

By: /s/ Brenda Funk  
Brenda Funk

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this the 27th day of February, 2024, true and correct copies of this document were served by the Court's ECF system on parties entitled to notice thereof and that, additionally, on the same day he caused a true and correct copy of this document to be served by U.S. first class mail, postage prepaid, on the parties listed on the attached service list.

By: /s/ *Conor White*  
Conor White